Standards for Documents Submitted for SHPO Review

in Compliance with Historic Preservation Laws

The Arizona State Historic Preservation Office (SHPO) reviews a variety of documents related to compliance with Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. 470, and the Arizona State Historic Preservation Act (SHPA), A.R.S. §41-861 *et seq*. In order to facilitate historic preservation compliance reviews, the SHPO has established documentation standards for survey reports, report abstracts, and cover letters. These documentation standards are based in part on guidance provided within the Secretary of the Interior's Standards, the Advisory Council on Historic Preservation publications and policies, 36 C.F.R. §800.11, National Register Bulletins, SHPO guidance on implementing the SHPA, and Arizona State Museum (ASM) rules for implementing the Arizona Antiquities Act, A.R.S. §41-841 *et seq*. These documentation standards are provided as guidance for state and federal agencies, as well as for local municipal governments when consulting with our office. The SHPO encourages agencies to share these standards with consultants and project proponents who assist agencies with compliance with historic preservation statutes.

REPORT ABSTRACT

The abstract is a concise summary of critical information that forms the basis of our review. It is important that EVERY report contain this abstract, as the SHPO uses the information to facilitate project reviews, project database management, and to fulfill internal and external reporting responsibilities.

PROJECT TITLE: Provide a concise title that contains key identifying words; please use the same title in subsequent correspondence. Add "revised" and revision date, if applicable.

PROJECT DESCRIPTION: Provide a brief description of the project, including proposed construction, any long-term development plans (e.g., different phases of construction that will occur through time), and the need for any ancillary facilities (e.g., access roads, materials source pits, distribution lines, etc.).

AGENCY: Provide name of lead federal or state agency for project, or local government that requires the inventory. Other agencies with jurisdiction over all or part of the undertaking, including land owner/manager, as well as funding and permitting agencies, should also be listed here.

PROJECT NUMBERS: List all pertinent project numbers, if available (e.g., agency's, SHPO's, etc.).

LAND STATUS/JURISDICTION: List all land jurisdictions. Please distinguish rights-of-way (ROW) or easement-holders, as well the land manager/agency on whose land the easement or ROW is situated.

LOCATION: Provide the name of the nearest city or topographic feature (if applicable), county, legal description (Township, Range, Section, and Quarter-Section), USGS quad name(s), and UTM coordinates (including starting and ending coordinates for large linear projects).

PERMIT NUMBER(S): List all project permits (e.g., ASM; BLM field work authorization; ARPA permit; USFS Special Use Permit; etc.).

NUMBER OF SURVEYED ACRES: Provide total number of surveyed acres. Also identify the acreage of any portion of the project area that was not surveyed. If multiple land owners/managers are involved, provide acreage by respective land ownership.

DATE(S) OF FIELD SURVEY: Self-explanatory.

NUMBER OF CULTURAL RESOURCES: Provide the total number of cultural resources (i.e., sites, buildings, structures, objects, districts, and/or isolates) within the project area, including all previously recorded cultural resources that have been identified in the project area.

LIST OF REGISTER ELIGIBLE PROPERTIES: List site numbers and/or property names and/or addresses for all cultural resources that were previously determined eligible, as well as any newly recorded cultural resources that were determined/recommended eligible for the Arizona or National Register of Historic Places (A/NRHP).

For previously recorded cultural resources, make a distinction between sites that have been "determined" eligible by agencies in consultation with the SHPO, and those that were "recommended" as eligible by consultants.

Any cultural resources listed on the A/NRHP should also be provided in this section.

LIST OF INELIGIBLE PROPERTIES: List site numbers and/or property names/addresses for all cultural resources that were previously recorded and were determined ineligible, and any newly identified resources that were determined/recommended not eligible for inclusion on the A/NRHP.

For previously recorded cultural resources, make a distinction between properties that have been "determined" ineligible by agencies in consultation with the SHPO, and those that were "recommended" as ineligible by consultants.

LIST OF PROPERTIES FOR WHICH ELIGIBILITY IS NOT DETERMINED: List site numbers and/or property names/addresses of all cultural resources for which A/NRHP eligibility status could not be determined.

ASSESSMENT OF EFFECT AND TREATMENT RECOMMENDATIONS: Include brief assessment of the potential direct, indirect, and cumulative effects of the undertaking/plan on Register-eligible resources; provide brief recommendations for avoidance, minimization, or mitigation treatment options.

STANDARD REPORT INFORMATION

Inventory reports must provide the following information:

1. Project Description: The report must include a detailed description of the undertaking/plan with photographs, maps, and drawings, as necessary. Maps and photographs must be of professional quality and legible in a photocopied version; illegible photographs are not acceptable. A description of the types of potential surface and subsurface impacts (direct, indirect, and cumulative) anticipated from the project, including visual or auditory effects, should be provided. The project area must be plotted on USGS map(s) that illustrate the boundaries of the area of potential effect (APE) and the location of project elements (for example, a transmission line project might include the power line right-of-way, pole locations, access roads, and construction staging areas). Maps must show land ownership if multiple jurisdictions are involved. The project description should include a discussion of the relevant historic preservation statutes and regulations, including any Programmatic Agreements that may be pertinent.

2. Previous Research/Records Search: This section should contain a summary of previous inventories conducted within the project area, and the results of literature (archaeological, ethnographic, historic, etc.) and records search (i.e., AZSITE, land managing agency files, GLO and Sanborn maps, land-use records available at ASLD for State Trust Land, SHPO records, museums, etc.). If previous surveys within the project area are more than 10 years old, then there should be a discussion on the adequacy of those surveys, including whether the previous surveys were conducted to current standards (following SHPO's Guidance Point No. 5 at http://azstateparks.com/SHPO/review.html).

   For additional guidance on background research, see *National Register Bulletin* "Researching a Historic Property," as well as the SHPO's various context studies (http://azstateparks.com/Giftshop/03_books.html), and the SHPO's "Historical Archaeology Research Guide" (http://azstateparks.com/publications/index.html).

   Unless previously agreed upon, cultural resources and previous surveys identified within a one-mile buffer zone around the project boundary must be plotted on a 1:24,000 scaled topographic map, and summarized in a table and in the report text.

3. Physiographic Context: An environmental description of the project area, including climate, biotic zone, surficial geology, soils, and landforms should be included in each report. The detail required for this section will depend on the nature and extent of the undertaking, as well as the cultural resources and their locations within the project area. Paleoenvironmental information should be included as appropriate.

4. Culture History: The length and detail of the prehistory and history presented in this section should be tailored to the project location, the nature and extent of the undertaking, and the cultural resources identified. This section should also identify any existing historic context studies that are applicable to the project area. The culture history should reference the appropriate literature, and should reflect current research.

5. <u>Survey Expectations</u>: This section may include estimates of the number and type of cultural resources anticipated in the project area based upon the results of background research. The report summary should also include a discussion of whether or not these expectations were met, as well as possible explanations for any differences between survey expectations and actual survey results.

6. <u>Survey Methods</u>: A description of all efforts to identify cultural resources (such as literature or archival records search, tribal consultation, archaeological survey, ethnographic interviews, etc.) must be included in all reports. For archaeological surveys, reports should include comments on ground surface visibility, areas omitted from intensive survey and the rationale behind the decision to omit them, survey methodology, professional qualifications of individuals performing the survey, as well as project management. If a field survey covered less than 100 percent of the project area, then the sampling strategy should be discussed, along with the rationale behind the sampling strategy; a discussion of any consultation with SHPO that occurred regarding sample survey composition should also be provided. The site definition criteria used for identifying archaeological sites must be explicitly stated (e.g., ASM site designation criteria, Forest Service criteria, etc.).

7. <u>Survey Findings</u>: This section must include a thorough description of all cultural resources identified; the survey locations and all identified cultural resources must be plotted on USGS 1:24,000 topographic maps.

    Prehistoric and historic archaeological sites must include a site map that clearly shows the relationship of cultural features within the site, site boundaries, natural features (trees, streams, washes, cliffs, etc.), topography, areas of disturbance, and proposed impacts (for example, a proposed right-of-way). Archaeological site descriptions must include details on possible temporal and cultural affiliations, all features observed, diagnostic artifacts noted, surface artifact density and diversity, relevant photographs, as well as information of the integrity of each site (for example, amount of ground disturbance, potential for subsurface archaeological remains, potential to provide important information, and likelihood that human remains are present).

    It is important to note that artifact density should be characterized as estimated counts, or ranges, of artifacts observed on the site's surface. Ranges like "200 to 300 artifacts" or "one to five artifacts per square meter" are acceptable, but "200+" is not. If the terms such as "low," "medium," or "high" density are to be used, then these terms must be explicitly defined/quantified (in the report's Methodology section) in relation to artifacts per square meter. Overly broad ranges, such as 0.01 to 0.99 artifacts per square meter, may need to be further subdivided (e.g., low-to-moderate, moderate-to-high) and quantified.

    The depositional environment of archaeological sites should be characterized (e.g., residual, eluvial, colluvial, alluvial, aeolian, etc.), if possible.

    ASM site numbers should be obtained for all archaeological sites, and agency-specific site numbers may also be required on some federal or tribal lands.

For historical-period sites, in addition to the information above, important diagnostic artifact characteristics (maker marks, technological aspects, embossing, etc.) should be referenced (with information source cited), described, and/or illustrated. A listing of these artifacts should be included with dates of production, information about the product, contents, function, etc. Attribute data that is appropriate for historic period artifacts should be recorded by a professional who is qualified to make these observations.

For standing architecture (i.e., buildings and structures), the attached **State of Arizona Historic Property Inventory Form** (available through SHPO or online at http://azstateparks.com/SHPO/nationalregister.html) must be completed and included in the documentation for each building and structure; instructions are included with the form. The property description must always include photographs, an assessment of the condition of the property, any architectural details that embody the distinctive characteristics of a type, period or method of construction, and, if applicable, the property's association with events or individuals that are pertinent to its significance. The surrounding built environment should be described in sufficient detail to insure that potential historic districts and cultural landscapes may be identified and considered. If modifications to the building or structure have been made, these should be described. Information on such sites should also identify the original owner(s) and dates of use based on archival research or oral interviews. Other historical sites, structures, and objects should be thoroughly described, although the inventory form is not used. For additional guidance, see *National Register Bulletins*, *"Guidelines for Evaluating and Registering Historical Archaeological Sites and Districts"* and *"Guidelines for Local Surveys: a Basis for Preservation Planning."*

For traditional cultural places (TCPs), the report should include sufficient information about the traditional use of the place and its role in the culture to support a determination of eligibility. For additional guidance on evaluating these properties, see *National Register Bulletin 38, "Guidelines for Evaluating and Documenting Traditional Cultural Properties."*

Arizona/National Register of Historic Places Evaluations: Reports must contain evaluations of the National Register eligibility of each cultural resource identified, and must present the property type (i.e., site, building, structure, object, or district) for each cultural resource evaluated. Explanations supporting the determination of eligibility, or a recommendation that a particular property is not eligible, must be presented in detail and include assessments of historic significance and integrity. If it is not possible to determine the eligibility of a cultural resource, a thorough explanation for this evaluation needs to be provided.

Register evaluations must include the historic context(s) within which the significance of each identified cultural resource has been evaluated in order to assess the eligibility of those resources for inclusion in the A/NRHP. A historic context minimally consists of the place, time, and theme under which the cultural resource is significant. The SHPO has also published numerous historic context studies that should be used to guide the evaluation of the property types defined in those documents; these studies are available for purchase on the ASP website at http://azstateparks.com/Giftshop/03_books.html).

However, in many instances, "The person documenting the site or property must define potential historic contexts and evaluate the significance of the resource in the perspective of each context…. Numerous historic contexts may need to be considered, and substantial documentation gathered, to place the property in an appropriate context" *(National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation")*. In the absence of relevant published historic contexts (e.g., SHPO's historic context studies or those generated by a land manager), the culture history of the area may be utilized to assist with eligibility assessments, but it must be specifically oriented toward evaluating the resources identified during survey, not simply a general "boiler plate" summary of generalities on the prehistory and history of the region.

Register-eligibility evaluations must include the criterion or criteria under which a property is significant: Criterion A (association with events); Criterion B (association with significant person); Criterion C (distinctive design, construction, work of a master); Criterion "D" (can yield or have yielded important information). When applying the A/NRHP criteria, keep in mind that a property may be eligible under more than one criterion, and that an archaeological site may be eligible under criteria other than just Criterion "D." If archaeological testing is required in order to complete an A/NRHP evaluation, then the evaluation should specify why the significance assessment cannot be completed using available data. Additional archival research about historical-period sites may be recommended as a part of treatment, but the inventory report must include a discussion of the character-defining elements, type, period, method of construction, or high artistic merit that make it eligible for inclusion on the Register(s). Isolated occurrences (artifacts, features, etc.) must also be evaluated for their Register-eligibility.

In addition to establishing its property type, significance, and historic context, the integrity of each cultural resource must be assessed when evaluating a property's A/NRHP eligibility. "Integrity is the ability of a property to convey its significance (*National Register Bulletin 15)*." Aspects of integrity include: location, design, setting, materials, workmanship, feeling, and association.

Register-eligibility evaluations may presented in tabular format for ease of reference, but tabular lists of eligibility should not be presented simply as "yes" or "no" without supporting arguments – the specific A/NRHP criterion or criteria under which a cultural resource is eligible must be listed.

Although consultants are usually asked by agencies to make recommendations regarding Register-eligibility, which can be helpful to the agency and the SHPO, it is the agency's responsibility to submit their formal determination of eligibility to the SHPO for concurrence. Should there be a disagreement between the federal agency and the SHPO on eligibility, the final authority is the Keeper of the National Register. For state agency projects, and/or projects on state or private lands, the determination of, and final authority on, eligibility to the Arizona Register of Historic Places is the State Historic Preservation Officer.

8. Assessment of Effect and Property Treatments: An evaluation of the potential for a federal undertaking or a state plan to directly, indirectly, or cumulatively affect Register-eligible properties must be provided. The potential for visual, auditory, and atmospheric

effects of an undertaking on historic properties should be evaluated. Specifically indicate if the federal undertaking or state plan will or will not affect Register-eligible properties. If the undertaking/plan will affect a Register-eligible property(ies), provide a brief discussion of mitigation/treatment alternatives (e.g., avoidance, data recovery, documentation, adaptive re-use, etc.) considered by the agency, and the agency's recommendation for mitigation/treatment. The SHPO provides advice to agencies regarding mitigation measures, but the final decision regarding mitigation rests with the responsible agency.

9. <u>Tabular Data</u>: A table of all cultural resources identified with the APE with the following information should be included with each report: site number, property name/address, location (UTM coordinates using NAD 27/83 or address), land jurisdiction, property type, property age, and eligibility to the A/NRHP. This table should be an Appendix to the report so that it can be easily redacted for Freedom of Information Act or state-level requests (Public Records Requests), or whenever site locational information needs to be protected.

10. <u>References/Bibliography</u>: Each report must contain a bibliography of all references cited.

<u>Agency Inventory Forms</u>: Please note that agency-specific inventory forms (without additional information in a report format) will only be accepted as adequate documentation as part of a formal agreement between the agency and the SHPO.

<u>Letter reports</u>: Letter reports are not encouraged, but may constitute adequate documentation for smaller projects, if no cultural resources (including Isolated Occurrences) are identified in the project area. Letter reports must contain a map of the project area, and must show all areas subjected to field survey; a Report Abstract must accompany any letter report.

<u>COVER LETTER</u>

A cover letter from the responsible Agency official must be included with all consultations submitted to the SHPO; the letter should summarize all of the information that is critical to the consultation and review process. The federal or state agency must send the cover letter on agency letterhead, except in cases where specific regulations (at this time, only US Dept. of Housing and Urban Development regulations) or Programmatic Agreements (e.g., Federal Communications Commission) authorize the agency to delegate its historic preservation compliance responsibilities. A cover letter should not be used in lieu of necessary project documentation, such as cultural resources reports, treatment/mitigation plans, tribal consultation documentation, and other supplementary materials, as discussed above. It is important to note that, if the consultation documentation is insufficient, the SHPO response will be delayed until it is provided.

All cover letters should contain the following information, at a minimum:

1. A description of the project (including all planned actions), definition of the project area including the area of potential effects (APE), and the agency's efforts to identify historic properties and obtain and consider the view of affected local governments, Indian tribes,

and other interested parties. For architectural properties, indicate whether the proposed action is an addition, replacement, repair, or demolition.

2. A description of the cultural resources that might be impacted directly, indirectly, or cumulatively by those actions. This should include a discussion of the potential impacts of the undertaking on all Register-eligible resources and the basis for these statements.

3. An evaluation of the eligibility of those resources for inclusion in the Arizona or National Register of Historic Places, including a determination of Register-eligibility by the responsible federal agency.

4. A finding of effect by the responsible agency; appropriate findings are: <u>No Historic Properties Affected, No Adverse Effect, or Adverse Effect</u>. There can be only one finding of effect for a given undertaking/plan.

5. A description and evaluation of the alternatives evaluated and treatment or mitigation proposed. This should include alternatives identified during the NEPA process (for federal projects), as well as any alternatives specifically designed to avoid or reduce impacts on cultural resources. Some examples include: realigning a road to avoid demolishing a historic property, use of overhead rather than underground transmission lines in a given area to avoid physically impacting an archaeological site, or adaptive reuse rather than demolition of a historic building. The discussion of treatment or mitigation measures should include those that were considered but not chosen, and the reasons for selecting the preferred measure. Alternative actions (including avoidance) considered, and the proposed treatment of any Register-eligible properties in order to reduce the potential adverse effects of the undertaking on those properties, should be discussed.

6. A summary of tribal consultation efforts, including consultations on identifying Traditional Cultural Properties, sacred sites, traditional use areas, etc. should be provided; government-to-government consultations with tribes should be clearly articulated. Indicate which tribes participated in consultation, and describe the process of government-to-government consultation (for example, phone calls, letters, meetings, field visits, e-mails, etc.). The results of the tribal consultation efforts should be summarized.

7. Requested action on the part of SHPO (e.g., concurrence with definition of the APE, concurrence on determinations of eligibility, concurrence with a finding of effect, etc.).

SUMMARY

In order to facilitate our review of compliance documents associated with state and federal historic preservation laws, the SHPO needs specific information. Information that is critical to our review of federal undertakings and state plans is summarized below:

1. **Description of Project/Undertaking/Plan --** A thorough description of the proposed project addresses the following basic questions: Who, What, Where, When, How, and Why?

2. **Identification of Cultural Resources --** A good description of the efforts used to identify cultural resources (i.e., background research/field survey/Native American consultation/oral histories, etc.) and the results of the identification efforts must be provided.

3. **Evaluation of Eligibility** -- A thorough evaluation of Register-eligibility assesses the historic significance of cultural resources (all five property types and isolates) based upon established historic contexts, as well as on newly developed historic contexts, if needed. Register-eligibility evaluations also integrate assessments of the integrity of cultural resources.

4. **Provision of Project Finding of Effect** -- There are three possible effect findings: a) No Historic Properties Affected, b) No Adverse Effect, and, c) Adverse Effect. If impacts to cultural resources that are eligible for inclusion in, or listed on, the Arizona or National Register of Historic Places are anticipated, then discussions of how to avoid, minimize, or mitigate those effects should be included. Indirect and cumulative effects should also be considered.

The documentation standards provided above provide requirements for the content of cultural resource survey reports and historic architectural/structural inventory documentation, as well as guidance for the covers letters transmitting reports to our office. Please be advised that, if consultation documents (including cover letters, reports, and supplementary materials), do not provide the information requested above, then the SHPO will request that information; failure to provide all pertinent information with the original submittal will delay SHPO review. The SHPO reviews and comments on several thousand projects annually, so adherence to these documentation standards will greatly facilitate our review of project submittals and, ultimately, our response.

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